Commonwealth of Kentucky
Division for Air Quality

PERMIT STATEMENT OF BASIS

DRAFT
Conditional Major, Operating
Permit: F-07-018
Curtis - Maruyasu America, Inc.
Lebanon, Kentucky 40033
March 16, 2007
Frough Sherwani, Reviewer

SOURCE ID:	21-155-00021
SOURCE A.I. #:	2896
ACTIVITY ID:	APE20060001

SOURCE DESCRIPTION:

On November 02, 2006 the Division received an application from Curtis - Maruyasu America, Inc. for the renewal of their permit F-01-029 (Revision 2) to operate a fuel and brake tubing manufacturing facility.

Curtis-Maruyasu America, Inc. is an existing source located in Lebanon. This source manufactures fuel and brake tubing. The source has a three tubing lines (One DWT line, one SWT line and one Nylon coated tubing line).

Emission Point 07: Furnace Brazing (DWT Line)

MP1: DX Gas Generator

Description:

Usage Rate:	10.3 MMBtu/hr
Fuel Usage:	Natural Gas
Construction Commenced:	December 1996

MP2: Copper Coated Tubing

Description:

Material Usage Rate:	864 lbs/hr
Tectyl usage rate:	1.0 lb/hr
Kerosene usage rate:	3.2 lbs/hr
Construction Commenced:	December 1996

MP3: Electric Furnace

Emission Point 10: Primer Dip Booth and Curing Oven (DWT Line)

MP1: Primer Dip Booth (4.76 mm Copper Coated Tubing)

Description:

Material Usage Rate:	823 lbs/hr
KP-Colour # 8452-Primer NC-3 usage:	5.8 lbs/hr
KP-Colour # 8452-Thinner usage:	4.8 lbs/hr
Construction Commenced:	December 1996

MP2: Primer Curing Oven

Description:

Usage Rate:	15,000 Btu/hr
Fuel Usage:	Natural Gas
Construction Commenced:	December 1996

Emission Point 11: Fluoride Coating and Baking (DWT)

MP1: Two Dip Booths

Description:

Fuccaron #3000 Color usage:	23.2 lbs/hr
Isophorone usage:	3.1 lbs/hr

MP2: Two Paint Curing Ovens

Description:

Usage Rate:	15,000 Btu/hr, each
Fuel Usage:	Natural Gas
Construction Commenced:	December 1996

Emission Point 28: Nylon - Coated Tubing Line

MP1: 6.35 mm Tubing

Description:

Usage Rate:	534 lbs/hr
Construction Commenced:	April 2000

MP2: 8.0 mm Tubing

Description:

Usage Rate:	688 lbs/hr
Construction Commenced:	April 2000

MP3: 10.0 mm Tubing

Description:

Usage Rate:	878 lbs/hr
Construction Commenced:	April 2000

MP4: Primer Dip Application

Description:

KP Color PA-3NC Primer usage:	1.2 lbs/hr
KP-Colour # 8452-Thinner usage:	1.3 lbs/hr
Construction Commenced:	April 2000

Emission Point 12: Regenerating Thermal Oxidizers (RTO #1)
To control emissions (VOC/HAPS) from emission points 07, 10, 11 and 28

Description:

Destruction Efficiency:	95%
Rated capacity:	2.7 MMBtu/hr
Fuel usage	Natural Gas
Construction Commenced:	March 2006

Emission Unit 30 Single-Walled Tube Line

MP1: 6.35 mm Tubing

Description:

Usage Rate:	534 lbs/hr
Construction Commenced:	December 2006

MP2: 8.0 mm Tubing

Description:

Usage Rate:	688 lbs/hr
Construction Commenced:	December 2006

MP3: 10.0 mm Tubing

Description:

Usage Rate:	878 lbs/hr
Construction Commenced:	December 2006

MP4: Three Dip Booths

Description:

KP-Colour # 8452-Primer NC-3 usage:	4.2 lbs/hr
KP-Colour # 8452-Thinner usage:	7.4 lbs/hr
Fuccaron # 3000 usage:	68.82 lbs/hr
Fuccaron # 3000 Thinner:	6.76 lbs/hr
Construction Commenced:	December 2006

MP5: Three Curing Ovens

Description:

Usage Rate:	15, 000 Btu/hr, each
Fuel Usage:	Natural Gas
Construction Commenced:	December 2006

MP6: Regenerating Thermal Oxidizers (RTO #2)
To control emissions (VOC/HAPS) from emission point 30

Description:

Destruction Efficiency:	95% tested on January 30, 2007
Rated capacity:	2.7 MMBtu/hr
Fuel usage	Natural Gas
Construction Commenced:	December 2006

TYPE OF CONTROL, AND EFFICIENCIES:

Regenerating Thermal Oxidizer (RTO #1):
To control emissions (VOC/HAPS) from emission points 07, 10, 11 and 28

Description:

Destruction Efficiency:	95%
Rated capacity:	2.7 MMBtu/hr
Fuel usage	Natural Gas
Construction Commenced:	March 2006

Regenerating Thermal Oxidizers (RTO #2):
To control emissions (VOC/HAPS) from emission point 30

Description:

Destruction Efficiency:	95% tested on January 30, 2007
Rated capacity:	2.7 MMBtu/hr
Fuel usage	Natural Gas
Construction Commenced:	December 2006

RTO # 2 was tested on January 30, 2007. Both the RTOs (RTO # 1 and 2) are identical, therefore results of RTO # 2 are the representative of the RTO # 1.

EMISSION FACTORS AND THEIR SOURCE:

A combination of material balances and AP-42 emission factors were used to estimate emissions.

APPLICABLE REGULATIONS:

401 KAR 52:030. Federally-enforceable permits for non major sources**.**
401 KAR 59:010, New Process Operations (applicable to each affected facility associated with a process operation commenced on or after July 2, 1975)

EMISSIONS AND OPERATING CAPS DESCRIPTIONS:

1. The source has accepted a facility-wide cap on annual VOC emissions of no more than 90.0 tons per rolling 12-month period. Compliance with this allowable will be demonstrated by record keeping and emissions estimating methodology specified in the terms and conditions of the permit.

2. The source has accepted a facility-wide cap on annual individual HAP emission of no more than 9.0 tons per rolling 12-month period. Compliance with this allowable will be demonstrated by record keeping and emissions estimating methodology specified in the terms and conditions of the permit.

3. The source has accepted a facility-wide cap on annual combined HAPS emissions of no more than 22.5 tons per rolling 12-month period. Compliance with this allowable will be demonstrated by record keeping and emissions estimating methodology specified in the terms and conditions of the permit.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.